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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

| | | |
|---------------------------|---|--|
| UNITED STATES OF AMERICA, |) | NO. CR 23-CR-00491 JD |
| |) | |
| Plaintiff, |) | STIPULATION TO MOVE CHANGE OF PLEA |
| |) | DATE AND EXCLUDE TIME FROM MARCH 10, |
| v. |) | 2025 TO APRIL 14, 2025 AND [PROPOSED] |
| |) | ORDER |
| JULIO ROMAN-TORRES, |) | |
| |) | |
| Defendant. |) | |

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Julio Roman-Torres, that the currently set Change of Plea Hearing be continued to April 14, 2025 and time be excluded under the Speedy Trial Act from March 10, 2025 through April 14, 2025.

At the last status conference held on January 27, 2025, the matter was continued to March 10, 2025 for a further status conference. *See* Dkt. 52. The government and counsel for the defendant agreed that time be excluded under the Speedy Trial Act so that defense counsel could continue to prepare, including by reviewing the discovery already produced. Undersigned counsel had recently taken over as the attorney of record for Mr. Roman-Torres and needed the time to review the discovery and get up to speed. On March 4, 2025, the March 10 status conference was continued, through a clerk's notice, to April 7, 2025. *See* Dkt. 53.

STIPULATION TO EXCLUDE TIME AND ~~[PROPOSED]~~ ORDER
Case No. CR 23-491 JD

v. 7/10/2018

1 The parties are unavailable on April 7, 2025 and, as a result, are requesting the Court continue
2 the Change of Plea Hearing to April 14, 2025. The parties will use this additional time to finalize their
3 review of the discovery in the matter and discuss case outcomes. For these reasons, the parties stipulate
4 and agree that excluding time from March 10, 2025 through April 14, 2025 will allow for the effective
5 preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further stipulate and agree that
6 the ends of justice served by excluding the time from March 10, 2025 through April 14, 2025 from
7 computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a
8 speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

9 The undersigned Assistant United States Attorney certifies that he has obtained approval from
10 counsel for the defendant to file this stipulation and proposed order.

11
12 IT IS SO STIPULATED.

13 DATED: March 5, 2025

/s/
Charles F. Bisesto
Assistant United States Attorney

15 DATED: March 5, 2025

/s/
Alanna Coopersmith
Counsel for Defendant Julio Roman-Torres

~~[PROPOSED]~~ ORDER

Based upon the facts set forth in the stipulation of the parties and for good cause shown, the Court agrees to continue the matter to April 14, 2025 for a Change of Plea Hearing and finds that failing to exclude the time from March 10, 2025 through April 14, 2025 would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time from March 10, 2025 to April 14, 2025 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the matter be continued to April 14, 2025 for a Change of Plea and the time from March 10, 2025 through April 14, 2025 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

IT IS SO ORDERED.

DATED: March 10, 2025



JAMES DONATO
United States District Judge